



**Lewis  
Baach  
Kaufmann  
Middlemiss**  
PLLC

Ronald Abramson  
212 822 0163  
ronald.abramson@lbkmlaw.com

March 21, 2018

**VIA ECF**

The Honorable Michael A. Hammer, U.S.M.J.  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: WAG Acquisition L.L.C. v. Multi Media, LLC, *et al.* (14-cv-2340);  
WAG Acquisition L.L.C. v. WMM LLC, *et al.* (14-cv-2345);  
WAG Acquisition L.L.C. v. Flying Crocodile, *et al.* (14-cv-2674);  
WAG Acquisition L.L.C. v. Gattyan Group S.a.r.l, *et al.* (14-cv-2832);  
WAG Acquisition L.L.C. v. FriendFinder Networks Inc., *et al.* (14-cv-3456);  
WAG Acquisition L.L.C. v. Vubeology, Inc., *et al.* (14-cv-4531); and  
WAG Acquisition L.L.C. v. WebPower, Inc., *et al.* (15-cv-3581)**

Dear Judge Hammer:

WAG Acquisition, L.L.C. (“WAG”) and the Defendants in the above-referenced cases submit this letter to the Court to bring to the Court’s attention recent decisions that issued since the parties’ briefing. The parties believe that these decisions might be helpful to the Court during the upcoming March 28 Oral Argument. Along with this letter, the parties submit copies of the cited cases.

**Plaintiff’s cited cases:**

1. *Steuben Foods, Inc. v. Shibuya Hoppmann Corp.*, No. 10-cv-00781-EAW-JJM (W.D.N.Y. Jan. 16, 2018), *report and recommendation adopted*, 2018 WL 1363503 (W.D.N.Y. Mar. 16, 2018).
2. *3G Licensing, S.A. v. HTC Corp.*, No. 17-83-LPS-CJB, 2017 WL 6442101 (D. Del. Dec. 18, 2017).



Hon. Michael A. Hammer  
March 21, 2018  
Page 2

**Defendants' cited cases:**

1. *Cutsforth, Inc. v. LEMM Liquidating Co.*, No. 12-1200 (SRN/LIB), 2018 WL 847763 (D. Minn. Feb. 13, 2018).
2. *Infinity Computer Prods. v. OKI Data Ams., Inc.*, Nos. 12-6797, 12-6799, 12-6800, and 12-6808, 2018 WL 1035793 (E.D. Pa. Feb. 23, 2018).

We thank the Court for its kind consideration of this submission. The parties do not believe that further briefing is needed, and we look forward to the upcoming hearing. Should Your Honor have any questions, we are available at the Court's convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ronald Abramson', is positioned above the printed name.

Ronald Abramson

cc: Counsel of record (via ECF)